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*Mark Rose, Joseph Kupiec, The Nevada*

*Commercial Group, and John Pinjuv*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

NEWMARK GROUP, INC., G&E ACQUISITION  
COMPANY, LLC, and BGC REAL ESTATE OF  
NEVADA, LLC,

) CASE NO.: 2:15-cv-00531-RFB-GWF

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) **STIPULATION AND ORDER TO**  
) **EXTEND DISPOSITIVE**  
) **MOTIONS DEADLINES SET IN**  
) **JANUARY 3, 2023 ORDER**  
) **(FIRST REQUEST)**

AVISON YOUNG (CANADA) INC.; AVISON  
YOUNG (USA) INC.; AVISON YOUNG -  
NEVADA, LLC, MARK ROSE, THE NEVADA  
COMMERCIAL GROUP, JOHN PINJUV, and  
JOSEPH KUPIEC; DOES 1 through 5; and ROE  
BUSINESS ENTITIES 6 through 10

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Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Plaintiffs Newmark Group, Inc. G&E Acquisition Company, LLC, and BGC Real Estate of Nevada, LLC (“Plaintiffs”) and Defendants Avison Young (Canada) Inc., Avison Young (USA) Inc., Avison Young – Nevada, LLC, Mark Rose, The Nevada Commercial Group, John Pinjuv, and Joseph Kupiec (“Defendants”), by and through their respective attorneys of record, stipulate as follows:

1. On January 3, 2023, in connection with ruling that Defendants were permitted additional deposition time with Plaintiffs’ Rule 30(b)(6) witness, the Court reset the deadline for dispositive motions to March 15, 2023, with responses due no later than April 17, 2023 and replies due no later than May 1, 2023. ECF No. 615. This is the first stipulation of time to extend these deadlines.

2. Due to various urgent demands on counsel’s time, including Defendants’ lead counsel in this matter handling two temporary restraining orders and two motions to dismiss in recent weeks in unrelated matters, the parties have reached an agreement and hereby stipulate that both parties be allowed an additional 14 days to file dispositive motions, resulting in a due date of March 29, 2023.

3. The parties hereby stipulate and agree to extend the response deadline by a corresponding 14 days, resulting in a response deadline of no later than May 1, 2023.

4. The parties hereby stipulate and agree to extend the deadline for replies by a corresponding 14 days, resulting in a deadline of no later than May 15, 2023 for replies.

5. This proposed stipulation and Order is made in good faith and is not intended to delay or otherwise impede the expeditious resolution of this matter, or otherwise burden the Court in any manner.

WHEREFORE, the Parties respectfully request that this Court enter an Order modifying the existing dispositive briefing schedule such that the Parties’ opening motions are due on March 29, 2023; responses are due on May 1, 2023; and replies are due on May 15, 2023.

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1 DATED: March 6, 2023

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3 By: /s/ Tina B. Solis

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22 *BGC Real Estate of Nevada, LLC*

DATED: March 6, 2023

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By: /s/ Robert S. Larsen

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IT IS SO ORDERED:

  
RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 9th day of March, 2023.